

REMARKS

Claims 1-20 are pending in this application. Claims 1 and 17 are independent claims. Claims 1, 17, and 19 have been amended by this Amendment.

Previous Arguments Repeated

Applicant respectfully submits that claims 1-20 are allowable at least because the cited prior art does not suggest each and every one of the combination of features recited in the claims. Arguments were previously set forth in support of the Pre-Appeal Brief Request for Review filed on October 27, 2006 and are hereby incorporated by reference in their entirety. Applicant requests that, if any of the claims are again rejected based on any of the previously applied prior art references, that the Examiner provide a written response to these arguments so that the examination of this application may progress. In particular, applicant requests that the arguments be considered to the same extent as if they were submitted in response to an Office Action. See, for example, MPEP 707.07(f). Indeed, the arguments were made in response to the final Office Action dated July 27, 2006.

Claim Amendments

Applicant has amended the claims in several respects. First, the preambles of independent claims 1 and 17 have been amended so that the inventions are no longer characterized as an "improvement" and so that various other minor corrections are made. Thus, independent claim 1 is directed to an apparatus for facilitating network-initiated bearer setup of a bearer between a communication node and a correspondent node through operation of a selected bearer manager, and independent claim 17 is directed to a method for facilitating network-initiated bearer setup of a bearer

between a communication node and a correspondent node through operation of a selected bearer manager.

Secondly, applicant has also discovered and corrected an ambiguity in the claim language. Specifically, applicant discovered that there was no antecedent basis for "the first bearer setup request" near the end of independent claim 1. Whereas the first bearer setup request generator previously recited in claim 1 merely requested the selected bearer manager to create the bearer, independent claim 1 has been amended so that the first bearer setup request generator is also "configured to generate a first application-level bearer setup request..." Thus, there is no proper antecedent basis for the first bearer setup request in claim 1.

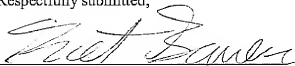
Finally, the independent claims 1 and 17 have been amended to recite additional features of the invention. (Dependent claim 19 has also been amended to be consistent with the amendments made to claim 17.) For example, claim 1 is amended to recite the features that the first bearer setup request generator is "configured to . . . provide the first application-level bearer setup request to a transport-level entity" and that the request is "free of the network address of the selected bearer manager". These features have the advantage that, due to a "redirection" of the application level bearer setup request to the transport level (see Fig. 6 of this application for a non-limiting example) using existing transport level (AAA) infrastructure, the selected bearer manager can be addressed without using its network address in the generated application level bearer setup request. More to the point, these features are not suggested by the applied prior art.

Furthermore, claim 1 is additionally amended to state that the request generated at the application level is then provided to a transport level entity. (This feature was already recited in independent claim 17.) This interaction of different levels and their correlation with different

functionalities is not suggested by the applied prior art.

The Commissioner is hereby authorized to charge any additional fees necessary for the consideration of this Amendment or the Request for Continued Examination (RCE), or to credit any overpayment, to the undersigned attorney's Deposit Account No. 10-0100 (Dkt. No. NOKIA.5003US).

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "Robert M. Bauer", is written over a horizontal line.

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